

THE FIRM, P.C.
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARTIN GOMEZ, an Individual,

Plaintiff,

v.

Case No.: 2:13-cv-01570-JAD-VCF

**STIPULATION TO STAY FURTHER
PROCEEDINGS AND ORDER**

SUZUKI MOTOR CORPORATION, a
Foreign Corporation, SUZUKI MOTOR OF
AMERICA, INC., a Delaware Corporation,
DOES I through X, and DOE
CORPORATIONS I through X, inclusive,

Defendants.

Plaintiff hereby moves this Court under F. R. Civ. P. 4(m) for an Order extending time for the service of the Complaint and Summons on Defendant SUZUKI MOTOR CORPORATION, a Foreign Corporation located in Shizuoka, Japan ("Suzuki Japan"). This Motion is based upon F. R. Civ. P. 4(m) and the attached Declaration of Ryan Alexander, Esq.

1. Plaintiff filed this action on August 29, 2013 and served Defendant SUZUKI MOTOR OF AMERICA, INC., a Delaware Corporation ("Suzuki America"). The defendant remaining to be served is the Japanese parent company of SUZUKI MOTOR OF AMERICA, INC.

2. Plaintiff has retained Legal Language Services, a translation and process service company, to serve Suzuki Japan according to the Hague Convention.

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3. The parties stipulated to the extension of time to file a responsive pleading, which was submitted on December 19, 2013 by Defendants' Nevada counsel of Feldman | Graf, P.C., and was ordered by this Court on December 20, 2013. This Court approved the first extension until February 25, 2014. A second motion to extend is pending.

4. Legal Language Services warns that service in Japan will take up to five months to complete.

5. If discovery proceeds now, it will create difficulties in scheduling discovery and trial deadlines at this time because of duplicative work between related but distinct corporate entities.

6. Accordingly, it would be appropriate to stay the proceedings for up to five months and set a telephonic status check in 120-150 days.

DATED this 10th day of March, 2014.

THE FIRM, P.C.

FELDMAN GRAF, P.C.

/s/ Ryan Alexander
RYAN ALEXANDER
Nevada Bar No. 10845
Attorney for Plaintiff

/s/David J. Feldman
David J. Feldman, Esq.
Nevada Bar No. 5947
Attorney for Defendants

ORDER

For the reasons set forth above, this matter is stayed for 150 days for the completion of Hague Convention compliant service on Defendant Suzuki Motor Corporation. A status check will be set for August 15, 2014 at 10:00 AM/PM to review case status.

The time to serve Defendant Suzuki Motor Corporation is extended to August 8, 2014.

IT IS FURTHER ORDERED that Plaintiff's Motion to Extend Time for Service on Defendant Suzuki Motor Corporation (#11) is DENIED as MOOT.

Dated: March 14, 2014.


UNITED STATES ~~DISTRICT COURT~~
JUDGE Magistrate